



February 24, 2015
Via ECFS

**REDACTED –
FOR PUBLIC INSPECTION**

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**RE: Smart City Solutions, LLC
FRN 0008209074
Special Access Data Collection
WC Docket No. 05-25, RM10593**

Dear Ms. Dortch,

Attached are the public versions of the essay responses for the above referenced Special Access Data Collection proceedings, submitted on behalf of **Smart City Solutions, LLC** ("Company") and in accordance with *Order and Data Collection Protection Order*, DA 14-1424, adopted October 1, 2014.

The Company's responses have also been submitted via the Special Access Web Portal.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel
Consultant to Smart City Solutions, LLC

cc: Debbie Huttenhower - Smart City
file: Smart City - FCC SADC
tms: FCCx1501

CR/gs

CERTIFICATION

I have examined the responses and certify that, to the best of my knowledge, all statements of fact, data, and information contained therein are true and correct.

Signature: /s/ James Schumacher

Printed Name: James Schumacher

Title: VP Finance & Administration

Date: 2/24/2015

**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.5**

Question: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response:



**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.8.**

Question: Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

- a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.
- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.
- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

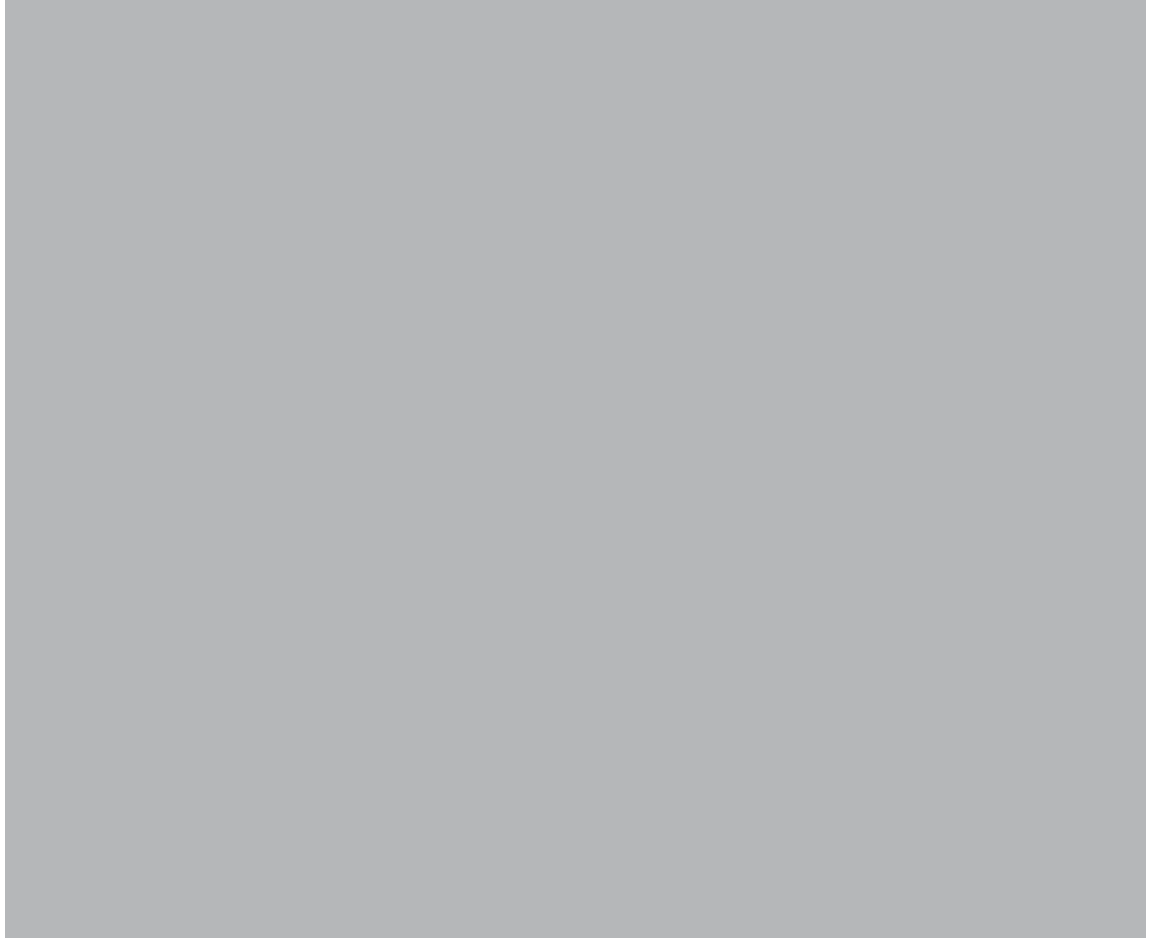
Response:



**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.8.**



**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.10.**

Question: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:



**Copy Sheet - Customer Approval****CenturyLink® Yellow Pages published by Dex Media**

Customer ID 1320658546 Marketing Consultant FATIMA GALAN Based on AD ID _____
Product CFL Heading WHITE PAGES UDAC WLLHH
Listing TN 407-827-2000 Listing Name Smart; City

Important! This is your chance to review the Product!

The clarity/color and size of the published Product may vary slightly from this proof. If the proof is not signed and returned, the Product will print as is.

Check the Accuracy ✓ Business Name ✓ Address ✓ Phone Number ✓ Web Address/Case Sensitive ✓ Spelling

**PLEASE REVIEW THE ABOVE PRODUCT CAREFULLY.****Make sure any changes you want have been noted.**

Pay special attention to phone numbers, addresses, business names, internet addresses (case sensitive), spelling/typographical errors, placement of text in the Product, photos/ artwork and the publications in which you want the Product to appear. Dex Media will not accept any change in illustration, size or color.

Please remember that this Product is subject to the terms and conditions of your Marketing Services Agreement.

I APPROVE THIS PRODUCT FOR PUBLICATION.

Customer Authorization _____
Customer Name and Title _____

Date _____



Copy Sheet - Customer Approval

CenturyLink® Yellow Pages published by Dex Media

Customer ID 1320658546 Marketing Consultant FATIMA GALAN Based on AD ID _____
 Product CFL Heading INTERNET UDAC HPWP
 Listing TN 407-827-2000 Listing Name Smart; City

**Important! This is your chance to review the Product!**

The clarity/color and size of the published Product may vary slightly from this proof. If the proof is not signed and returned, the Product will print as is.

Check the Accuracy ✓ Business Name ✓ Address ✓ Phone Number ✓ Web Address/Case Sensitive ✓ Spelling

SmartCity®

**Data**

- Dedicated Services
- High Speed Internet Access
- WiFi Network Implementation
- Point to Point Services

Voice

- T1 & PRI Services
- Local & Toll Free Service
- Popular Features & Calling Plans
- Full Feature Phone Lines



Talk to our local team today,
and let us build a solution
that works for you!

(407) 827-2000

www.smartcity.com

MAKING THE WORLD SMARTER. ONE CITY AT A TIME®

P.O. Box 22555, Lake Buena Vista, Florida 32830

Ad image size reduced

PLEASE REVIEW THE ABOVE PRODUCT CAREFULLY.

Make sure any changes you want have been noted.

Pay special attention to phone numbers, addresses, business names, internet addresses (case sensitive), spelling/typographical errors, placement of text in the Product, photos/ artwork and the publications in which you want the Product to appear. Dex Media will not accept any change in illustration, size or color.

Please remember that this Product is subject to the terms and conditions of your Marketing Services Agreement.

I APPROVE THIS PRODUCT FOR PUBLICATION.

Customer Authorization _____

Date _____

Customer Name and Title _____



Copy Sheet - Customer Approval

CenturyLink® Yellow Pages published by Dex Media

Customer ID 1320658546 Marketing Consultant FATIMA GALAN Based on AD ID _____
 Product CFL Heading TELEVISION-CABLE, CATV & SATELLITE UDAC HPWP
 Listing TN 407-827-2000 Listing Name Smart; City



Important! This is your chance to review the Product!

The clarity/color and size of the published Product may vary slightly from this proof. If the proof is not signed and returned, the Product will print as is.

Check the Accuracy ✓ Business Name ✓ Address ✓ Phone Number ✓ Web Address/Case Sensitive ✓ Spelling

SmartCity®



Data

- Dedicated Services
- High Speed Internet Access
- WiFi Network Implementation
- Point to Point Services

Voice

- T1 & PRI Services
- Local & Toll Free Service
- Popular Features & Calling Plans
- Full Feature Phone Lines



Talk to our local team today,
and let us build a solution
that works for you!

(407) 827-2000

www.smartcity.com

MAKING THE WORLD SMARTER. ONE CITY AT A TIME®

P.O. Box 22555, Lake Buena Vista, Florida 32830

Ad image size reduced

PLEASE REVIEW THE ABOVE PRODUCT CAREFULLY.

Make sure any changes you want have been noted.

Pay special attention to phone numbers, addresses, business names, internet addresses (case sensitive), spelling/typographical errors, placement of text in the Product, photos/ artwork and the publications in which you want the Product to appear. Dex Media will not accept any change in illustration, size or color.

Please remember that this Product is subject to the terms and conditions of your Marketing Services Agreement.

I APPROVE THIS PRODUCT FOR PUBLICATION.

Customer Authorization _____

Date _____

Customer Name and Title _____

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.18.

Question: If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response: Not applicable.

**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.A.19.**

Question: Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

Response:



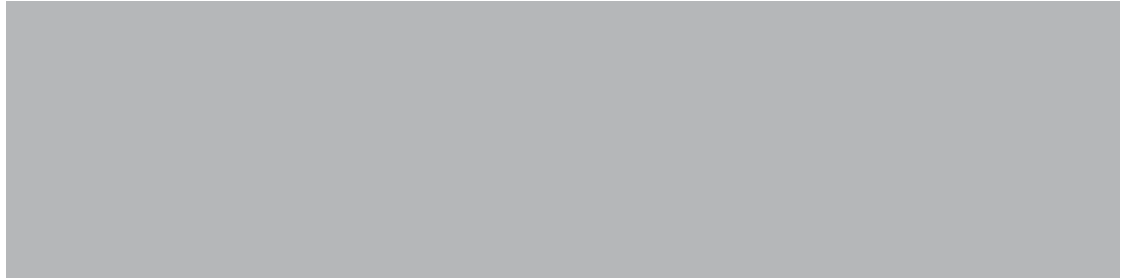
**HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**REDACTED –
FOR PUBLIC INSPECTION**

**Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.D.1.**

Question: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response:



Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Smart City Solutions, LLC
Question II.D.2.

Question: Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response: Smart City Solutions, LLC records policies related to (a) the initiation of service; (b) service upgrades; and (c) service disconnections in its data services agreement with customers. The terms of the agreements are not publicly available. The policies are made available to the customer when an offer of service is made by Smart City Solutions, LLC. The policies are conveyed to customers in writing on the data services agreement.